Remarks for the "Response to Non-Final Office Action dated 2/1/2007"

[0001] Applicant respectfully requests reconsideration and allowance of all of the claims of the application. Claims 1-28 are presently pending. Claims amended herein are 21-23. Claims withdrawn or cancelled herein are none. New claims added herein are none.

Summary of Interview

[0002] Examiner Osberg graciously talked with me—the undersigned Attorney for the Applicant—on 4/11/2007. Applicant greatly appreciates the Examiner's willingness to talk. Such willingness is invaluable to both of us in our common goal of an expedited prosecution of this patent application.

[0003] In that discussion, the Applicant pointed out key differences between the claims and primary cited art ("Gershony"), for example, the use of a "token", a "dummy or mock token", and the relationship between "first" and "second" graphics systems. The Examiner maintained her original rejections despite Applicant's identification of these key differences. Consequently, Applicant sumits formal agrument herein directed towards those key differences.

Formal Request for an Interview

[0004] If the Office's reply to this communication is anything other than allowance of all pending claims, then I formally request an interview with Examiner Osberg. I encourage Examiner Osberg to call me—the undersigned

Attorney for the Applicant—so that we can talk about this matter so as to resolve any outstanding issue quickly and efficiently over the phone.

[0005] Otherwise, please contact me or my assistant to schedule a date and time for a telephone interview that is most convenient for both of us. While email works great for us, I welcome your call to either of us as well. Our contact information may be found on the last page of this response.

Claim Amendments

[0006] Claims 21-23 are amended in order to expedite prosecution and quickly identify allowable subject matter. These claims are amended to make their recitation consistent with the language of the other claims. These claims are not amended for any other substantive reason or to avoid any cited reference.

Substantive Claim Rejections

Claim Rejections under § 112

[0007]   Not applicable.

Claim Rejections under § 101

[0008]   Not applicable.

Claim Rejections under § 102

[0009]   Claims 1-6, 8-13 and 15-28 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,549,218 to Gershony *et al.* (hereinafter "Gershony").   Respectfully, Applicants traverse the rejections, and submit that the claims, including amended claims 21-23, are allowable over Gershony for at least the reasons explained in detail below.

Independent Claim 1

[0010]   Claim 1 is reproduced here [with emphasis added]:

1.   (Original) A system for enabling interoperability between two graphics technologies, comprising:

a first graphics system configured to render window content in a first mode, the first graphics system being further configured to reference a **first type** of window **using a token** associated with an instance of the first type of window;

a second graphics system configured to render windows in a second mode, the second graphics system being further configured to reference a **second type** of window **without a need for the token used by the first graphics system**; and

an **interoperability** component configured to cause a **dummy token** to be created for an instance of a window of the second type and to use the dummy token if called to perform a graphics related action on the instance of the window of the second type.

[0011]   The Examiner contends that Gershony's "style bit" is analogous to the "token" of this claim. If that is so, then Gershony fails to teach or suggest, as recited in claim 1, "a second graphics system...configured to reference a **second type** of window **without a need for the token used by the first graphics system**."

[0012]   In fact, Gershony states the following (with emphasis added):

"If this is the first time that a window is being painted by an application, a device context is associated with the window by the window manager. The device context will **check the style bit** at 340 **to determine whether or not the window will be redirected**" (Gershony, Figure 3, item 340; column 7, lines 60-64).

"Output from an application or other program running in a windowing environment is redirected from the application to a bit map where it can be further manipulated prior to being displayed from the display screen buffer. The redirection can be performed on the windows of new applications as well as existing legacy applications. A **style bit is associated with each window** from applications which are to be so redirected" (Gershony, column 2, lines 44-51).

[0013] Gershony discloses that both window types (which the Examiner presumably analogizes to the claimed "first type of window" and "second type of window") require the use of Gershony's "token" to determine if Gershony will, or will not, redirect a window to the bit map.

[0014] Claim 1 recites a first graphics system "using a token" in reference to the first type of window. However, to the second graphic system references the second type of window "**without a need for the token** used by the first graphics system," as recited in claim 1.

[0015] Furthermore, in claim 1, recites the creation of a "dummy token," but Gershony does not disclose and the Examiner does not show anything in Gershony analogous to a "dummy token." In one or more implementations described in the Application, the "null device context" is an example of the "dummy token."

[0016] This dummy token (e.g. null device context) is used to provide interoperability with the first and second graphics systems. Gershony does not disclose the use of a null device context used to facilitate interoperability between two graphics systems. In fact, Gershony discloses that the device context is used to read a style bit for **both** types of windows.

[0017] Consequently, Gershony does not disclose all of the claimed elements and features of this claim. Accordingly, Applicant asks the Examiner to withdraw the rejection of this claim.

Independent Claim 12

[0018] Independent claim 12 is reproduced here (with emphasis):

12. (Original) A computer-readable medium having computer executable components for enabling interoperability between two graphics technologies, comprising:

an interoperability component that interfaces with an application program, the application program including a first window and a second window, the first window being compatible with a **first graphics system** that uses **tokens** to reference windows, the second window being compatible with a **second graphics system** that **does not rely on the tokens**; and

a **mock token** associated with the second window, the mock token indicating that the second window is compatible with the second graphics system.

[0019] The Examiner contends that Gershony's "style bit" is analogous to the "token" of this claim. If that is so, then Gershony fails to teach or suggest, as recited in claim 12, "the second window being compatible with a **second graphics system** that **does not rely on the tokens**"

[0020] As indicated by Fig. 3, item 340; col. 7, lines 60-64; and col. 2 lines 44-51 of Gershony (and reproduced in paragraph 0012 above), Gershony discloses that both window types require the use of Gershony's "token" to determine if Gershony will, or will not, redirect a window to the bit map.

[0021] Claim 12 recites a first graphics system "that uses tokens" in reference to the first window. However, this differs with the reference to "the second window being compatible with a **second graphics system** that **does not rely on the tokens,**" as recited in claim 12.

[0022] Furthermore, claim 12 recites the creation of a "mock token," but Gershony does not. In one or more implementations described in the Application, the "null device context" is an example of the "mock token."

[0023] This mock token (e.g. null device context) is simply used to provide interoperability with the first and second graphics systems. Gershony does not disclose the use of a null device context used to facilitate interoperability between two graphics systems. In fact, Gershony discloses that the device context is used to read a style bit for **both** types of windows.

[0024] Consequently, Gershony does not disclose all of the claimed elements and features of this claim. Accordingly, Applicant asks the Examiner to withdraw the rejection of this claim.

Independent Claim 21

[0025] Independent claim 21 is reproduced here (with emphasis):

21. (Currently Amended) A computer-implemented method for enabling interoperability between two graphics technologies, comprising:

receiving a request to create a new window;

determining if the new window is of a type associated with an **alternative graphics system**;

if so, creating a **dummy token** for the new window to facilitate interoperability with a **conventional graphics system**;

creating a new visual to be created in connection with the new window, the visual being a construct associated with the alternative graphics system; and

associating the **dummy token** with the new visual.

[0026] Claim 21 recites the creation of a "dummy token," but Gershony does not. In one or more implementations described in the Application, the "null device context" is an example of the "dummy token."

[0027] This dummy token (e.g., null device context) is simply used to provide interoperability with the conventional and alternative graphics systems. Gershony does not disclose the use of a null device context used to facilitate interoperability between two graphics systems. In fact, Gershony discloses that the device context is used to read a style bit for **both** types of windows.

[0028] Consequently, Gershony does not disclose all of the claimed elements and features of this claim. Accordingly, Applicant asks the Examiner to withdraw the rejection of this claim.

[0029] Claims 7 and 14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Gershony (U.S. 6,549,218) in view of the U.S. Patent 6,941,521 to Lin *et al.* (hereinafter "Lin").

[0030] Claims 7 and 14 ultimately depend upon independent claims 1 and 12, respectively. As discussed above, claims 1 and 12 are allowable. It is axiomatic that any dependent claim which depends from an allowable base claim is also allowable. Additionally, some or all of these claims may also be allowable for additional independent reasons.

Dependent Claims

[0031] In addition to its own merits, each dependent claim is allowable for the same reasons that its base claim is allowable. Applicant submits that Examiner Carleton withdraw the rejection of each dependent claim where its base claim is allowable.

Conclusion

[0032] All pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, **Examiner Osberg is urged to contact me before issuing a subsequent Action**. Please call/email me or my assistant at your convenience.

Respectfully, Submitted,

Dated: 4-24-07

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